



IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: :
: Chapter 11
CULLOO ENTERTAINMENT, LLC :
: Case No:
Debtors :
:

FIRST INTEREIM APPLICATION OF GAMBURG & BENEDETTO, LLC, FOR
ALLOWANCE AND DISBURSEMENT OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES

Gamburg & Benedetto, LLC, by and through Donald Benedetto, Esquire, counsel for Debtor Culloo Entertainment, LLC, in accordance with Federal Rules of Bankruptcy Procedure 2016 and pursuant to § 330 of the Bankruptcy Code, hereby requests an allowance of compensation and expenses for professional services rendered by it to the Debtor, and in support thereof stats as follows:

1. On October 1, 2024, the Debtor filed a voluntary Petition for Relief under Chapter 11 of the Bankruptcy Code;
2. On November 20, 2024, Debtor filed an application seeking to employ Gamburg & Benedetto, LLC ("Firm"), *nunc pro tunc*.
3. Prior to filing the Petition, Debtor and Firm entered into a fee agreement wherein the Firm agreed to provide legal services related to the filing and representation of Debtor in a Chapter 11, Subchapter V bankruptcy.
4. In return for firm's services, Debtor agreed to pay Firm a flat fee of \$30,000.00 for its services. Exhibit A., fee agreement.
5. The initial payment of \$15,000.00 was to be paid prepetition at the time of the execution of the agreement with the remainder as a post-petition payment due 90 days thereafter.

6. Further the fee agreement contemplates that Debtor is responsible for all costs associated with Firms representation in the instant matter outside of the flat attorney's fee.
 7. Debtor failed to pay at the time of execution; however, do to immediate time pressure, firm filed the Petition.
 8. This Application seeks interim compensation and interim reimbursement of expenses pursuant to the flat fee agreement.
 9. All services rendered and expenses incurred for which compensation is requested were performed for or incurred on behalf of the Debtor, and the services provided are actual, necessary services, and the compensation for those services is reasonable.
10. Professional services provided to the Debtor since retaining the Firm include, *inter alia*, the following:
- a. Pre-filing review of Debtor's business, financial records, debts, and other similar documents
 - b. Preparation of the Petition, Schedules, and Statements of Financial Affairs;
 - c. Preparation and attendance for the meeting of creditors;
 - d. Preparation of motions and applications;
 - e. Assistance in preparation and review of Monthly Operating Report;
 - f. Petition Fee,
 - g. Application for employment of professionals
11. Those professionals who have performed services for the Debtor and there respective rates are as follows:

Name & title	Years Admitted	Hours	Rate	Fee
Joseph D. Rutala, Esquire	12	8.4	\$400.00	\$3,320.03
Donald Benedetto	14	32	\$500.00	\$16,000.00

12. For the Application Period, the Firm rendered actual and necessary services with the reasonable value of \$19,3320.03, for which the Firm Seeks approval as an administrative claim.

13. The compensation herein is based on customary compensation charged by comparably skilled practitioners in cases other than cases under Title 11.

14. In compliance with L.B.R. 2016-2(a)(3), appended hereto as Exhibit B is a detailed statement of the actual and reasonable expenses incurred by the firm for the Application Period, for which the Firm seeks reimbursement in the amount of \$1,738.00.

15. The amount of expenses set forth on Exhibit B is calculated using the actual cost for filing the petition.

16. The Firm and its attorneys and employees are “disinterested” persons and have not represented or held any interest adverse to the estate or to the Debtor on matters for which the Firm was employed in compliance with 11 U.S.C. § 327(a).

17. The undersigned hereby certifies that the Debtor, on whose behalf the firm is employed, has been given an opportunity to review this Application prior to filing with the Court.

WHEREFORE, Gamburg & Benedetto, LLC respectfully requests that this Court enter an Order Granting the Application and approving and authorizing payment for compensation for the actual and necessary services rendered by Gamburg and Benedetto, LLC, in the amount of

\$19,320.03, for reimbursement of the actual and necessary expenses incurred by the Firm in the amount of \$1,738.00.

Respectfully submitted,

GAMBURG & BENEDETTO, LLC

/s/ Donald Benedetto
Donald Benedetto, Esquire (309199)
Attorney for Debtor